



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Reply To: OCE-084

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Ms. Sheila Smith, Environmental Coordinator
Emerald Services, Inc.
7343 E. Marginal Way South
Seattle, WA 98108

Re: Shipment of PCB-Contaminated Electrical Equipment to Roosevelt Regional Landfill

Dear Ms. Smith:

This letter concerns the information available to EPA which indicates that on December 17, 2007, Emerald Recycling Services, Inc. received a shipment of a contaminated electrical equipment from Ketchikan Public Utilities (Ketchikan) that was contaminated with polychlorinated bi-phenyls (PCBs) at a concentration of 198 parts per million (ppm). The PCB regulations at 40 CFR §§ 761.60(b)(4) and 761.60(b)(6)(ii)(A) require disposal of contaminated electrical equipment (PCB contaminated article) in a facility, licensed, or registered by a State to manage municipal solid waste subject to 40 CFR Part 258 or non-municipal non-hazardous waste subject to 40 CFR §§ 257.5 through 257.30.

The PCB regulations at 40 CFR 761.60-(b)(6)(ii)(B) and (C) further state that such PCB-contaminated articles from which all free-flowing liquids have been removed, are neither subject to the storage for disposal under 40 CFR Part 761, Subpart D, nor Subparts J and K. EPA requests that Emerald Services, Inc., provide a copy of the PCB analyses that were completed for the PCB containing oil and the PCB contaminated article stored at your location at 7343 E. Marginal Way South. In addition, for this same location, EPA requests that Emerald provide copies of the bills of lading and disposal records for the PCB contaminated articles. Please provide this information by March 31, 2008.

Please contact Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or duncan.daniel@epa.gov, if you have any questions.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Lloyd Gossman – City of Ketchikan

Please contact Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or duncan.daniel@epa.gov, if you have any questions.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Sheila Smith- Emerald Services, Inc.

Ms. Sheila Smith, Environmental Coordinator
Emerald Services, Inc.,
9010 E Marginal Way S, Suite 200
Seattle, WA 98108

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CONCURRENCES			
Initials:			
Name:	Dan Duncan	Cliff Villa, ORC	
Date:			